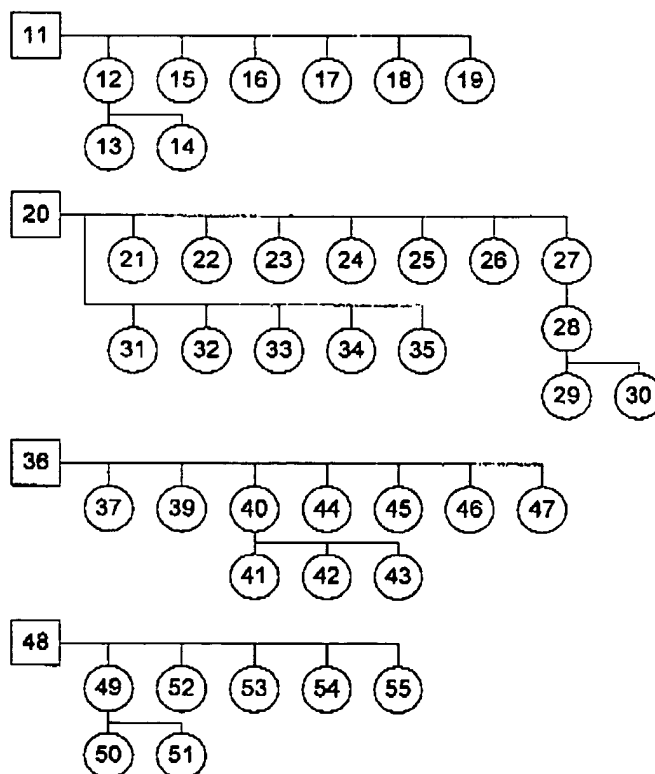In re Application of CARON et al.
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REMARKS

Reconsideration of the application is respectfully requested. A final Office action
mailed August 5, 2004 is pending in the application. Applicant has carefully considered
the Office action and the references of record. In the Office action, claims 11-37 and 39-
55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over combinations of
U.S. Patent No. 5,893,911 to Piskiel et al. (hereinafter *Piskiel*), U.S. Patent No. 6,336,139
to Feridun et al. (hereinafter *Feridun*), Gehani et al. "Event Specification in an Active
Object-Oriented Database" ACM SIGMOD 1992 (hereinafter *Gehani*), U.S. Patent No.
5,630,127 to Moore et al. (hereinafter *Moore*), and U.S. Patent No. 6,282,565 to Shaw et
al. (hereinafter *Shaw*). In this response to the Office action, claims 11 and 48 have been
amended. Therefore, claims 11-37 and 39-55 are pending in the application. The
following diagram depicts the relationship between the independent and dependent
claims.

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Rejections Under 35 U.S.C. § 103 of the Independent Claims

Each of the independent claims 11, 20, 36 and 48 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over combinations of *Piskiel, Feridun, Gehani, Moore* and *Shaw*. However, each of the independent claims 11, 20, 36 and 48 includes at least one feature not taught or fairly suggested by *Piskiel, Feridun, Gehani, Moore* or *Shaw* either alone or in combination. **Each feature of each claim must** be taught or suggested by the cited references in a proper rejection of the claim under 35 U.S.C. § 103(a). **None** of the features of the claim may be ignored. The Manual of Patent Examining Procedure (M.P.E.P.) drives home the point by stating that **each word** in the claim **must be** considered.

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. ... All words in a claim must be considered in judging the patentability of that claim against the prior art.

(M.P.E.P. § 2143.03, emphasis added). Therefore, each of the rejections under 35 U.S.C. § 103(a) of the independent claims 11, 20, 36 and 48 is improper and should be withdrawn. Examples of claim features missing from combinations of *Piskiel, Feridun, Gehani, Moore* and *Shaw* are given below for each of the independent claims 11, 20, 36 and 48.

Independent Claims 11 and 48

Independent claim 11 is directed to a machine-readable medium having instructions to perform a method that includes receiving, checking and performing steps. The checking step includes checking rules grouped by triggers in an order. The order of the checking is the order of the triggers.

> A queue ... associated with a plurality of triggers having a trigger ordering ... ;
>
> for each **trigger** associated with the queue, **in the order of the trigger ordering** of the plurality of triggers, **checking** ... each of the one or more rules ... grouped by the trigger.

(Independent claim 11, as amended, emphasis added). Neither *Piskiel* nor *Feridun* teach checking in the order of the trigger ordering. Presumably, *Shaw* is cited by the Office action as teaching checking in the order of the trigger ordering, but in fact, *Shaw* teaches that action priority is determined by the order of a rule in a rule list.

> Action priority is determined by **the rule's order** in the rule list.

(*Shaw*, column 6, lines 15-16, emphasis added). Even if, for purposes of applying *Shaw* to the claims, the rule list is said to be a trigger, *Shaw* does not teach an ordered plurality

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of rule lists, nor does *Shaw* teach checking in the order of the ordered plurality of rule

lists. Therefore, none of *Piskiel*, *Feridun*, *Shaw* or the other prior art of record, alone or

in combination, teach each feature of independent claim 11. Independent claim 11 is thus

patentable for at least this reason.

Independent claim 11 has been amended herein to prevent any confusion as to the

ordering referenced by the checking step. While checking may, in addition, occur in an

order further determined by a rule ordering or other suitable ordering, in independent

claim 11 checking occurs in the order of the trigger ordering which is explicitly required

to be independent of rule orderings.

> Any rule ordering of the one or more rules is **independent** of the trigger ordering.

(Independent claim 11, as amended, emphasis added). Independent claim 48 is amended

herein to explicitly include checking in both a trigger order and a rule order.

> **For each trigger associated with the queue, in the trigger order** of the plurality of
> triggers, **and for each checked rule** of the trigger, **in the rule order** of the set of
> checked rules grouped by the trigger: (a) **checking** ... (b) if ... then performing.

(Independent claim 48, as amended, emphasis added). Therefore, none of *Piskiel*,

Feridun, *Shaw* or the other prior art of record, alone or in combination, teach each feature

of independent claim 48 which is thus likewise patentable for at least this reason.

Independent Claim 20

Independent claim 20 is directed to a transactional message system including at

least one queue, a trigger store and a trigger service. The trigger store is required to store

one or more triggers. Each trigger is required to have a switchable enabled/disabled state

and a plurality of rules. Each rule is required to specify a condition and an action.

> A trigger store of at least one trigger ... each trigger having a switchable
> enabled/disabled state ... **and** ... **a plurality** of rules ... each rule, at least, specifying
> a condition and specifying an action.

(Independent claim 20, emphasis added). Neither *Piskiel* nor *Feridun* teach a trigger

having a switchable enabled/disabled state and a plurality of rules, each of which specify

a condition and an action. The Office action cites *Gehani* as teaching a trigger with a

switchable enabled/disabled state, but the trigger claimed by independent claim 20 is

required to have a switchable enabled/disabled state **and a plurality** of rules. Even if, for

the purposes of applying *Gehani* to the claims, a "trigger automaton" is called a

switchable enabled/disabled state, an "event" is called a condition and a "trigger-action"

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is called an action, *Gehani* teaches that a trigger automaton is associated with a single
event and trigger-action pair.

> trigger-list is a list of triggers each of which is specified as
>
> **trigger-name (parameters) :**
>
> > [perpetual] **event ==> trigger-action**

(*Gehani*, page 82, left column, emphasis added). Thus, even if an event and trigger-
action pair is called a rule, again stretching *Gehani* for the purposes of comparison with
the claims, *Gehani* does not teach each trigger having a trigger automaton and a plurality
of event and trigger-action pairs. That is, a single trigger automaton is not capable of
activating and deactivating a plurality of event and trigger-action pairs.

Therefore, none of *Piskiel, Feridun, Gehani* or the other prior art of record, alone
or in combination, teach each feature of independent claim 20. Independent claim 20 is
thus patentable for at least this reason.

Independent Claim 36

Independent claim 36 is directed to a transactional message system including at
least one queue, a trigger store, a trigger manager and means for checking and
performing. The trigger manager is required to provide for creating, editing and deleting
of **triggers and rules grouped in triggers** in a visual, non-programming manner.

> A trigger manager configured to, at least, provide for creating, editing and deleting of
> **triggers and rules grouped in triggers** in a visual, non-programming manner.

(Independent claim 36, emphasis added). Each trigger is required to group one or more
rules in the trigger. Each rule is required to specify a condition and an action.

> **Each** trigger grouping at least one rule in the trigger, **each rule,** at least, specifying a
> condition and specifying an action.

(Independent claim 36, emphasis added). Creating, editing and deleting triggers and rules
grouped in triggers thus includes creating, editing and deleting actions, conditions and
groups of rules.

The Office action cites the user interface of the Global Risk Management System
definition environment depicted in Figure 5 of *Moore* as teaching the trigger manager
configured as required by independent claim 36, but the rules of *Moore* are not the rules
of independent claim 36 and, even if the rules of *Moore* are said to be the rules of
independent claim 36 for the purposes of applying *Moore* to the claim, *Moore* does not

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teach editing triggers grouping rules and/or rules grouped in triggers. Conditions are relational expressions that can be satisfied, for example, that can evaluate to true or false. At best, Figure 5 of *Moore* could be construed as depicting the creation or editing of actions, for example, as depicted in Figure 2 of *Moore*, each *Moore* rule is a formula including an assignment operator. If *Moore* does not teach creating, editing and deleting rules then *Moore* can not teach creating, editing and deleting rules grouped in triggers. However, in addition, even if *Moore* is construed to teach creating, editing and deleting the rules required by independent claim 36, *Moore* nowhere teaches the creating, editing and deleting of groups of rules, for example, adding or deleting rules from different groups in a visual, non-programming manner.

Therefore, none of *Piskiel*, *Feridun*, *Moore* or the other prior art of record, alone or in combination, teach each feature of independent claim 36, and independent claim 36 is patentable for at least this reason.

Rejections of the Dependent Claims

Each of claims 11, 20, 36 and 48 is in independent form, whereas all of the remaining claims depend directly or indirectly on one of these four independent claims. The dependent claims are allowable for at least the same reasons that the four independent claims 11, 20, 36 and 48 are allowable in that the dependent claims incorporate the features of the independent claims. Nevertheless, the dependent claims further define subject matter not shown or rendered obvious by the prior art of record. Because the independent claims are allowable over the applied prior art, applicants do not believe remarks addressing this further subject matter are necessary herein.

CONCLUSION

The application is considered in good and proper form for allowance, and the examiner is respectfully requested to pass this application to issue. If, in the opinion of the examiner, a telephone conference would expedite the prosecution of the subject application, the examiner is invited to call the undersigned attorney.

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Date: September 9, 2004

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